

## TABLE OF CONTENTS

Chapter	Page
<u>A. GENERAL POLICY</u>	1
<u>B. INFORMING STUDENTS OF THEIR RIGHTS</u>	2
<u>1. Publication of Rights</u>	2
<u>2. Policy Availability</u>	2
<u>C. DIRECTORY INFORMATION</u>	2
<u>1. Categories of Directory Information</u>	2
<u>2. Reservation of Right to Refuse Release</u>	2
<u>3. Student Request for Non-Release</u>	3
<u>4. Annual Disclosure of Categories</u>	3
<u>D. STUDENT ACCESS TO RECORDS</u>	3
<u>1. General Policy</u>	3
<u>2. Right to a Response</u>	3
<u>3. Non-Accessible Records</u>	3
<u>4. Copies</u>	4
<u>5. Procedure</u>	5
<u>E. CHALLENGE AND AMENDMENT OF RECORDS</u>	5
<u>1. Request for Amendment</u>	5
<u>2. Right to Hearing</u>	5
<u>3. Hearing Procedures</u>	6
<u>4. Limitation on Right to Challenge</u>	6
<u>F. DISCLOSURE OF CONFIDENTIAL INFORMATION TO THIRD PARTIES</u>	6
<u>1. General Policy</u>	6
<u>2. Disclosure Without Consent</u>	6
<u>3. Disclosure to Parents</u>	9
<u>4. Record of Disclosures</u>	10
<u>5. Redisclosure</u>	10
<u>6. Right to Refuse Disclosure</u>	11
<u>7. Telephone Inquiries</u>	11
<u>G. REVIEWING AND EXPUNGING OF STUDENT RECORDS</u>	11
<u>H. RIGHT TO FILE A COMPLAINT</u>	11
<u>I. ADDITIONAL INFORMATION</u>	11
<u>J. STUDENT RECORDS COORDINATING OFFICES</u>	12
<u>APPENDIX A - LIST OF RECORD CUSTODIANS</u>	13

<u>APPENDIX B - COST OF RECORDS REPRODUCTION</u>	15
<u>APPENDIX C - FORMS</u>	16
1. <u>Request to Inspect and Review Student Records</u>	17
2. <u>Student Records Release Consent</u>	18
3. <u>Request to Withhold Release of Directory Information</u>	19

Revised 01/12

**Pepperdine University**

**Student Records Policy**

This Statement of Policy is promulgated in compliance with The Family Educational Rights and Privacy Act of 1974 (20 U.S.C. § 1232g.), better known as the Buckley Amendment or FERPA, and the new regulations thereunder (34 C.F.R. § 99 *et seq.*). These laws address two primary issues, both of which are covered by this policy statement: privacy of student records and the student's right of access to his or her records. The following policy is hereby adopted by Pepperdine University:

**A. GENERAL POLICY**

The University maintains records relating to students for numerous purposes, including academic, employment, health care, discipline, and financial assistance. As a custodian of student records, the University assumes an implicit and justifiable trust. This trust involves a recognition that, except for information generally considered to be a matter of public information (e.g., directory information), and certain other exceptions, student records are confidential to the student, to the institution, and in some cases to the student's parents. Should someone request personally-identifiable information about a student, the University will use information established in Guest Access, or request photo identification or other documentation in an effort to authenticate the individual and ensure her/his right to access such information.

The release and disclosure of student records are in large measure governed by federal laws. It is the purpose of these policies and guidelines to provide reasonable interpretation of the laws and to protect the student's right of privacy.

Consistent with FERPA regulations, the University is committed to protecting students' personally identifiable information, such as date of birth, mother's maiden name, or any other information that could help the requestor identify a student with reasonable certainty. The University will also protect information being sought by an individual who the University has reason to believe knows the identity of the student in question.

The rights recognized by law and affirmed under this policy are, except as may be specifically noted, rights of the students or former students who have attended this institution and for whom the University maintains academic records (including those who have taken courses through videoconference, satellite, internet, or other electronic information and telecommunication technologies), and not the rights of parents of students or individuals who have not attended Pepperdine University (including applicants for admission). In any non-postsecondary educational programs operated by the University, such rights shall accrue to the parents of any student who is under the age of eighteen. Student records, as governed by this policy statement, do not include:

## STUDENT RECORDS POLICY

1. Records in the sole possession of individual faculty or staff and not intended for official transmittal to others.
2. Law enforcement unit or security records maintained and used solely for that purpose.
3. Records relating to individuals who are employed by the institution, which are made in the ordinary course of business, relate exclusively to individuals in their capacity as employees, and are not available for use for any other purpose (Records of individuals employed as a result of their status as students, e.g., work-study participants, shall be governed by this policy).
4. Records of physicians, psychiatrists, psychologists, or other recognized professionals used solely for professional purposes, and are not available to anyone other than persons providing such treatment.
5. Records regarding a former student which relate to periods after he or she is no longer a student at the institution (e.g., information gathered on the accomplishments of alumni).

### **B. INFORMING STUDENTS OF THEIR RIGHTS**

1. Publication of Rights  
All currently enrolled students shall be informed in writing annually of their legal rights with regard to student records.
2. Policy Availability  
A copy of this policy is available on line at [www.pepperdine.edu/registrar/policies](http://www.pepperdine.edu/registrar/policies).

### **C. DIRECTORY INFORMATION**

1. Categories of Directory Information  
Directory information includes information contained in an education record of a student that would not generally be considered harmful or an invasion of privacy if disclosed. Directory information shall not include a student's social security number, date and place of birth, race/ethnicity, nationality or gender. The following information is designated as "directory information" pursuant to applicable law and, except as limited in this policy statement, is therefore subject to release to the public without prior notice to or consent of any student:
  - a. student's name
  - b. student's I.D. number (as long as it cannot be used to gain access to a student's personal identification number (PIN) or password)
  - c. address
  - d. telephone number
  - e. electronic mail address
  - f. photograph
  - g. classification (Freshmen, Sophomore, Junior, Graduate)

## STUDENT RECORDS POLICY

- h. major field of study
  - i. dates of attendance
  - j. enrollment status (full-time, part-time, undergraduate, graduate)
  - k. degrees and awards received
  - l. participation in officially recognized activities and sports
  - m. weight and height of members of athletic teams
  - n. most recent previous public or private school attended by student
  - o. theses titles/topics
2. Reservation of Right to Refuse Release
- The University reserves the right to refuse the release of any directory information without the written consent of the student to anyone not granted access thereto by law. The University will not knowingly serve as the focal source of information for landlords, creditors, collection agencies, and sales personnel.
3. Student Request For Non-Release
- Any student may request that directory information concerning the student should not be released to the public without his or her written consent.
- Such request shall:
- a. be in writing
  - b. be submitted to the appropriate custodian of student records or to the appropriate student records coordinating office (see section J)
  - c. designate the category(ies) of directory information not to be released
  - d. be submitted at any time during the student's matriculation at Pepperdine
  - e. be effective five (5) business days after submission of the request up to the time the student rescinds it in writing
4. Annual Disclosure of Categories
- The categories of personally identifiable information designated as "directory information" and the students' rights relative thereto shall be publicly disclosed at least annually.

### **D. STUDENT ACCESS TO RECORDS**

1. General Policy
- Except as limited below, unless student records are specifically excluded from the "right of access" by FERPA or the regulations thereunder, or unless a student has signed an effective waiver of his or her right of access to specific records, a student or former student shall have a right to inspect, review and seek to amend his or her educational records.
2. Right to a Response
- The right of access to student records shall include the right to receive a response within 45 days from the University regarding reasonable requests for explanation and interpretation of the

## STUDENT RECORDS POLICY

records. Such response may be given orally, but the University will entertain reasonable requests for a written explanation.

### 3. Non-Accessible Records

A student's right to access shall be limited as follows:

- a. When a student record contains information on more than one student, the requesting student may inspect or review or be informed of only the specific information which pertains to that student. If feasible, the record custodian shall remove the material pertaining to other students before granting access, otherwise, he shall mask off the irrelevant portion and copy only the relevant portion.
- b. Students have no right to examine financial records and statements of their parents or any information contained therein.
- c. Students have no right to examine confidential letters and confidential statements of recommendation (i) meeting the requirements of 34 C.F.R. § 99.12 (b)(2), if they were placed in the educational records prior to January 1, 1975, or (ii) meeting the requirements of 34 C.F.R. § 99.12 (b)(3), if they were placed in the educational records after January 1, 1975, and if the student has executed an effective waiver pursuant to paragraph (3)(d) below.
- d. Students may waive their rights to inspect and review confidential letters and confidential statements of recommendation respecting admissions, application for employment, or receipt of an honor or honorary recognition. The University may not require such waivers as a condition of admission or receipt of any other service or benefit, but students should be aware that recommendations and evaluations may not be very helpful or candid without a signed waiver. The waiver must be in writing, signed by the student, and must identify the specific records to which it is applicable. General waivers purporting to waive access to broad classes for records shall not be effective. Records for which there is a valid waiver may be used only for the purpose for which they were originally intended and may not be released to third parties even though the student has signed a written request that they may be so released. On request, the University will provide the student with the names of the individuals who provided the letters and statements of recommendations for which waivers have been provided. A student may revoke his waiver with respect to actions occurring after the revocation. Such revocation must be in writing and signed by the student.
- e. It shall be the responsibility of the record custodian to remove all non-accessible records prior to granting student or third party access.
- f. Students are not permitted access to treatment records as defined under 34 C.F.R. § 99.3 (b)(4), but they may have those records reviewed by a physician or other appropriate professional of the student's choice.

## STUDENT RECORDS POLICY

### 4. Copies

Students may request copies of the records to which they have the right of access. The custodian, in his/her sole discretion, may reject a request for copies or may require that they be made by University staff, with the student being charged for the cost of reproduction. (See schedule of reproduction costs in Appendix B.) Copy fees may be waived if such fee will prevent a student from executing his/her rights. Though the University may not deny access to records except as noted herein, the right to copy and the right to have copies of records released to third parties is subject to the University's discretion and its security interest in all student records, except as provided in 34 C.F.R. § 99.10 (d). A security interest in the records continues until all financial obligations to the University have been satisfied. Students who are making a bona fide challenge (as provided in this policy) to the content of their records may, in the discretion of the custodian of said records, obtain unofficial copies of the challenged records for the purpose of preparing evidence, upon giving written assurance that the records will not be released to third parties who are not assisting in the challenge.

### 5. Procedure

The record custodian, in his sole discretion, may allow students, under proper identification, access to their own records without formal procedures, after removing non-accessible records. However, the custodian may, in his/her discretion, require a written request for access and delay access for a reasonable time to ensure the records contain no material to which the student has no right of access. In no case will access be delayed beyond fifteen (15) days from the date of request. When students are given access to original records, the examination shall be made in the presence of University personnel, or under such other reasonable conditions as will prevent alteration, mutilation, or removal.

## **E. CHALLENGE AND AMENDMENT OF RECORDS**

### 1. Request for Amendment

A student, who has a good faith belief that information contained in his or her education records is inaccurate or misleading or violates the privacy rights of the student, may request of the record custodian that the records be amended. The phrase "inaccurate or misleading" refers to facts that are inaccurately recorded, such as a student's name or date and place of birth, and not conclusions that have been made, for example, about a student's performance or statements of opinion.

The student should clearly identify the part of the records he or she seeks to have changed and specify why it is inaccurate or misleading or in violation of his or her privacy rights. Within a reasonable period of time, the custodian may conduct an informal hearing or examination and shall decide whether or not to amend the records. If the custodian decides not to amend the records

## STUDENT RECORDS POLICY

as requested by the student, the custodian shall so inform the student and advise him or her of the right to a formal hearing as set forth below.

### 2. Right To A Hearing

A student may submit a written request to the Provost for a hearing to challenge the record custodian's decision to not amend his or her records as requested by the student. The request shall state the reasons for contesting the records. If the hearing results in a determination that the records are inaccurate, misleading or otherwise in violation of the privacy rights of the student, the University shall amend the records and so inform the student in writing. If the determination is otherwise, the student shall be informed of his or her right to place in his or her record a statement commenting on the information in the records and/or setting forth any reasons for disagreement with the decisions resulting from the hearing. The student's statement shall be maintained in the record as long as the contested portion is retained, and it shall be disclosed to all parties to whom the contested portion of the record is disclosed.

If the custodian denies a student's request for amendment of a record because the record, in his or her judgment, does not contain facts that are inaccurately recorded (i.e., the record contains a substantive judgment that is correctly recorded), the student does not have a right to a hearing or the right to place a statement in his or her record as described herein.

### 3. Hearing Procedures

- a. The hearing will be conducted within sixty days of the request, and the student shall be given reasonable advance notice of the date, place and time of the hearing.
- b. The hearing shall be conducted by a party or parties from within the University system to be selected by the Provost and who do not have a direct interest in the outcome of the hearing.
- c. The student shall be afforded a full and fair opportunity to present evidence relevant to the issues raised and may, at his or her own expense, be assisted or represented by one or more individuals of his or her own choice, including an attorney.
- d. The University will provide its decision in writing within thirty days after the conclusion of the hearing.
- e. The decision shall be based solely upon the evidence presented at the hearing and shall include a summary of the evidence and the reasons for the decision.

### 4. Limitation on Right to Challenge

The substantive judgment of a faculty member about a student's work, expressed in grades assigned in a course and other evaluations of a student's coursework, is not within the scope of the right to a hearing. The jurisdiction of such hearings extends to the factual and objective elements of the



## STUDENT RECORDS POLICY

content of student records, but not to the qualitative and subjective elements in grading and similar evaluation.

### F. **DISCLOSURE OF CONFIDENTIAL INFORMATION TO THIRD PARTIES**

#### 1. General Policy

University school officials may access records in which they have a legitimate educational interest. Otherwise, with the exceptions noted in paragraph 2 hereunder, the University may not disclose personally identifiable information from the educational records of a student, other than directory information, to anyone other than the student without the written consent of the student. Such consent shall be signed and dated, and specify the records to be disclosed, the purpose of the disclosure and the party or class of parties to whom disclosure may be made.

#### 2. Disclosure Without Consent

Disclosures of personally identifiable information to the following parties may be made without the student's written consent:

- a. Pepperdine University school officials with legitimate educational interests. Examples of a school official include, but are not limited to, a person employed by the University in an administrative, supervisory, academic or research, or support staff position (including law enforcement unit personnel and health staff); a person or company with whom the University has contracted (such as an attorney, auditor, or collection agent); a person serving on the Board of Regents; or a student serving on an official committee, such as a disciplinary or grievance committee or assisting another school official in performing his or her tasks. Such parties must be properly identified as school officials and must demonstrate to the record custodian that their "need to know" is directly related to legitimate educational interests and their assigned duties within the University. A school official generally has a legitimate educational interest if the official is:
  - i. performing a task related to his or her duties and responsibilities;
  - ii. performing a task related to a student's education or to the discipline of a student;
  - iii. providing a service or benefit relating to the student or to the student's family (e.g., housing, health care, counseling, job placement, financial aid, etc.); or
  - iv. maintaining the safety and security of the campus
- b. Officials of other educational institutions in which the student seeks or intends to enroll. The University shall make a reasonable attempt to notify the student of disclosure. The University shall also provide a copy of the disclosed record to the student. Upon

## STUDENT RECORDS POLICY

- request, the student shall be provided with an opportunity for a hearing.
- c. To authorized representatives of the U.S. Comptroller General, the U.S. Attorney General, the U.S. Secretary of Education, or State and local educational authorities, such as a State postsecondary authority that is responsible for supervising the university's State-supported education programs. Disclosures under this provision may be made, subject to the requirements of §99.35, in connection with an audit or evaluation of Federal- or State-supported education programs, or for the enforcement of or compliance with Federal legal requirements that relate to those programs. These entities may make further disclosures of Personally Identifiable Information to outside entities that are designated by them as their authorized representatives to conduct any audit, evaluation, or enforcement or compliance activity on their behalf. (§§99.31(a)(3) and 99.35)
  - d. Agencies or organizations in connection with financial assistance for which a student has applied or for which a student has received, pursuant to 34 C.F.R. 99.31(a)(4).
  - e. Accrediting agencies and certain organizations pursuant to 34 C.F.R. 99.31(a)(6) and (7).
  - f. To comply with a judicial order or lawfully issued subpoena. The University will make a reasonable effort to give notice to the parent or student unless the disclosure is in compliance with a Federal grand jury subpoena or any other subpoena issued for a law enforcement purpose where the court or other issuing agency has ordered that the information not be disclosed or that the student not be informed of the existence of the subpoena. If the University initiates legal action against a parent or student, or a parent or student begins legal action against the University, then the University may disclose to the court without a court order or subpoena the education records of the student that are relevant to proceed with the legal action.
  - g. To appropriate parties in a health or safety emergency, where such information is necessary to protect the health or safety of the student or other persons, pursuant to 20 U.S.C. § 1232g(b)(1), (h), 34 C.F.R. 99.31(a)(10), 99.32(a)(5) and 99.36. In such cases, the University will record the rational basis for non-consensual disclosure as required by federal law.
  - h. To parents of a dependent student as defined in section 152 of the Internal Revenue Code of 1986 (See #3 below).
  - i. An alleged victim of any crime of violence or non-forcible sex offense as defined in 18 U.S. C. § 16. Only the final results of any disciplinary proceeding conducted by the University against the alleged perpetrator of that crime or offense with respect to that crime or offense shall be disclosed. "Final results" means a decision or determination, made by an honor court or council, committee, commission, or other entity authorized to resolve disciplinary matters within the University. The disclosure of the final results include only .the name of the student, the violation committed (i.e., the University rule or policy that was violated and any essential findings supporting the University's conclusion that the violation was committed), and any sanction imposed

## STUDENT RECORDS POLICY

by the University against the student (i.e., a description of the disciplinary action taken, the date of its imposition and its duration).

The University also may disclose the final results before all internal reviews and appeals have been exhausted. The name of any other student, including a victim or witness, may not be disclosed without the prior written consent of that other student. Only disciplinary proceedings in which the final results were reached on or after October 7, 1998, may be disclosed.

The final results of a disciplinary proceeding may be disclosed to the victim regardless of whether the University concluded that the alleged perpetrator committed a violation of a University rule or policy. The final results of a disciplinary proceeding may be disclosed to the public when a student is alleged to have been a perpetrator of a crime of violence or non-forcible sex offense, and actually committed a violation of the University's rules or policies with respect to that allegation.

- j. Organizations conducting studies for, or on behalf of, educational agencies or institutions pursuant to 20 U.S.C. § 1232g(b)(1)(F) and 34 C.F.R. 99.31(a)(6) and 99.31(b). The University may release educational records for research that are coded (without disclosing the nature of the code) or after removing all personally identifiable information.
- k. To parents of a student under the age of 21 that committed a disciplinary violation with respect to alcohol or a controlled substance. In such circumstances, information regarding any violation of federal, state or local law, or any rule or policy of the institution, governing the use or possession of alcohol or a controlled substance, regardless of whether that information is contained in the student's education records may be disclosed. Determination of a disciplinary violation with respect to this provision may be made without conducting any sort of formal disciplinary proceeding. Any disciplinary violation under this exception that occurred before October 7, 1998, may not be disclosed.

This provision is not related to the student's status as a dependent for tax purposes. Any information that can be released under this provision could also be released to parents of students over 21, so long as they are dependents for income tax purposes.
- l. To the United States Attorney General, or any Federal officer or employee in a position not lower than an Assistant Attorney General and designated by the Attorney General, following submission of a written application to a court of competent jurisdiction for an ex parte order requiring the University to permit the Attorney General or his designee to collect education records in the University's possession that are relevant to an authorized investigation or prosecution of an offense listed in section 2332b(g)(5)(B) of title 18 United States Code, or an act of domestic or international terrorism as defined in section 2331 of that title.
- m. Information about registered sex offenders provided to Pepperdine under the Violent Crime Control and Law Enforcement Act of 1994 may be disclosed without student consent.

## STUDENT RECORDS POLICY

n. Under any other circumstances allowable by law.

### 3. Disclosure to Parents

Federal law permits the release of information from a student's records to his or her parents if the student is a dependent for federal income tax purposes unless the student has submitted credible evidence of non-dependency. Parents requesting information may be granted access upon submission to the University of a signed statement or other evidence of Federal Income Tax Dependency. Therefore, the University may, in its sole discretion, disclose personally identifiable information to parents who claim a student as a federal income tax dependent. In implementing the discretionary policy, it shall be the University's objective to safeguard the privacy of students while recognizing the supporting parents' legitimate needs for information about their tax-dependent son's or daughter's academic progress and behavior. The following presumptions and procedures shall govern the issues of federal income tax dependency and the release of information from student records to parents:

- a. Except in unusual circumstances provided for in "e." below, a student's parents who request information from their son's or daughter's records shall be required to submit credible written evidence that their son or daughter is a federal tax dependent. Such evidence may be in the form of a sworn affidavit, a copy of page 1 of their most recent federal income tax return, a letter from the Internal Revenue Service, or other such documentary evidence. Submission of such evidence shall give rise to a presumption of federal tax dependency unless contradictory evidence is presented to the University. In the absence of contradicting evidence, such evidence shall be valid for a period not to exceed the end of that academic year.
- b. A presumption of tax dependence based solely upon a parent's sworn affidavit shall be rebuttable by a contradicting sworn affidavit by the student, and further evidence shall be required to establish tax dependency.
- c. In the event that contradicting evidence regarding tax dependency is submitted to the University, the senior University official in the appropriate student records coordinating office (see section J) shall decide the issue of tax dependency. He or she shall inform the student and the parents of the conflicting evidence and give both parties a reasonable time to submit such evidence as they may choose. His/her decision shall be based solely upon the evidence presented, shall be in writing, and shall state the reasons for the decision. The evidence and written decision shall be available for inspection and copying by each party.
- d. The good faith decision of the designated officer shall not be subject to challenge except in a suit for declaratory judgment in a court of competent jurisdiction. No release to parents shall be made while such a suit is pending. Neither the University nor the official deciding the issue of tax dependency shall be held liable for acting in reliance upon the good faith of the deciding official.

## STUDENT RECORDS POLICY

e. The University may rely upon a parent's oral confirmation of a student's federal tax dependency in the following circumstances:

- (1) There is no credible written evidence to the contrary; and
- (2) In the good faith judgment of a responsible University official, the welfare of the student, other students, or the University necessitates the release of information to the parent before written evidence could be reasonably obtained.

### 4. Record of Disclosures

The University shall maintain as part of the educational records of a student a record of disclosures which indicates the parties who have requested or obtained personally identifiable records and the legitimate interests such parties had in requesting or obtaining the information. This record shall be retained for examination by the student until the related records are destroyed. Such record of disclosure is not required for disclosures:

- a. to the student for his or her own use
- b. to the parent pursuant to paragraph 3 above
- c. to anyone pursuant to a student's written consent which specifically identifies the parties
- d. to school officials pursuant to paragraph (2)(a) above of directory information

### 5. Redisclosure

Confidential information shall be disclosed pursuant to this policy only on the condition that the party to whom disclosure is made will sign the appropriate release form and not disclose the information to any party without the prior written consent of the student, with the following exceptions:

- a. When disclosure is made to an institution, agency, or organization, its offices, employees, and agents may use the information for the purpose for which the disclosure was made, pursuant to the requirements of 20 U.S.C. § 1232g(b)(4)(B).
- b. When disclosure is made to the parties under paragraph 2 above and disclosure includes the names of the additional parties to which the receiving party may disclose the information and the legitimate interest which each of the parties has in the information.
- c. When disclosure is to the student or his/her parents.  
The University shall inform the party to whom disclosure is made of the requirements regarding redisclosure.

### 6. Right to Refuse Disclosure

Nothing in this policy statement shall be construed to require the University to disclose personally identifiable information from student records to the parties eligible for disclosure without written consent of the student. The University reserves the right to refuse such disclosures.

### 7. Telephone Inquiries

Only "directory information" may be released in response to telephone inquiries, and such release is entirely discretionary with the University. This privilege is extended primarily to other University officers and employees.

**G. REVIEWING AND EXPUNGING OF STUDENT RECORDS**

Each record custodian is responsible for reviewing educational records maintained by his or her office; and, with the exception of academic records maintained by the Registrar, the custodian has the right to expunge any or all material from a student's educational records. Each office has a timetable for the destruction of records upon expiration of the period for which they must be kept according to statute. However, after a request for access to student records has been submitted to the custodian pursuant to this policy statement, no records or parts thereof may be altered or destroyed prior to allowing the student access to the records. Also, no statements submitted by a student contesting the contents of a record may be removed or destroyed prior to the removal or destruction of the contested record. The record of disclosures of student records required by this policy statement must be maintained until the underlying educational record is destroyed.

**H. RIGHT TO FILE A COMPLAINT**

Any student alleging failure of the University to comply with the Family Educational Rights and Privacy Act of 1974 may file a complaint with the Family Policy Compliance Office, U.S. Department of Education, Washington, D.C., 20202-4605. Students are encouraged to utilize internal University grievance procedures to resolve complaints prior to contacting outside agencies.

**I. ADDITIONAL INFORMATION**

Inquiries concerning student rights under FERPA should be addressed to the appropriate student records office (see section J).

FERPA is Public Law 93-380 as amended by section 2 of Public Law 93-568, and may be found at 20 U.S.C. § 1232g. The Department of Education Regulations may be found at 34 C.F.R. 99 *et seq.*

**J. STUDENT RECORDS OFFICES**

The appropriate student records offices are as follows:

1. Office of the University Registrar: for Seaver College, the Graduate School of Education and Psychology, the Graziadio School of Business and Management, and the School of Public Policy.
2. Records Office, School of Law – School of Law, Malibu.

## APPENDIX

## A

**PEPPERDINE UNIVERSITY  
LIST OF RECORD  
CUSTODIANS**

This list is subject to change and shall be the responsibility of the Office of the University Registrar.

**SCHEDULE OF EDUCATION RECORDS MAINTAINED BY PEPPERDINE**

**UNIVERSITY Seaver College, 24255 Pacific Coast Highway, Malibu, CA 90263**

**Graduate School of Education and Psychology, 24255 Pacific Coast Highway, Malibu, CA  
90263**

**Graziadio School of Business and Management, 24255 Pacific Coast Highway, Malibu, CA  
90263**

**School of Public Policy, 24255 Pacific Coast Highway, Malibu, CA  
90263**

	<b>Type of Record</b>	<b>Responsible Office</b>	<b>Title/Custodian of Records</b>
1.	Student Academic Records	Office of the University Registrar	University Registrar/Associate Registrar for Student Information
2.	Academic Advising	Dean, Divisional Chairman/Faculty Office	Dean, Associate Dean or Senior Academic Advising Associate
3.	Information Technology	Information Technology	Associate Vice President, IT
4.	Admissions	Seaver College Admission GSEP Admissions GSBM Admissions SPP Admissions	Dean of Admission Admissions Specialist GSBM Director of Admissions SPP Admissions
5.	Alumni	Advancement & Alumni Relations	Director for Advancement & Alumni Relations of each School – GSEP, SBM, Seaver and SPP
6.	Credits Committee Petitions	Office of the University Registrar	University Registrar/Associate Registrar for Student Information
7.	Student Demographics	Office of the University Registrar	University Registrar/Associate Registrar for Student Information
8.	Financial	Finance/Student Accounts	Director of Student Accounts
9.	Financial Assistance	Financial Assistance Office	Director of Financial Assistance of each school

## STUDENT RECORDS POLICY

10.	International Students	International Student Services	Director, International Student Services
11.	Health and Medical	Health Service	Director, Student Health Services
12.	Student Housing	Residential Life	Associate Dean of Students/Director of Housing
13.	Psychological Counseling	Counseling Center	Director, Counseling Center
14.	Student Employment	Career Center	Manager, Student Employment
15.	Mail Services	Mail Service/Mailroom	Manager, Mail Services
16.	Press Release	Public Information	Director, Office of Public Information
17.	Registration Records	Office of the University Registrar	University Registrar/Associate Registrar for Student Information
18.	Campus Security/Public Safety	Public Safety Office	Director, Public Safety
19.	Special Programs	Special Programs Office	Director, Special Programs
20.	Sports Information	Athletics Department	Director of Athletics
21.	Student Life	Student Activities Office	Associate Dean of Students/Director of Student Activities
22.	Student Publications	Student Publications Office	Director, Student Publications
23.	Testing	Counseling Center	Director, Counseling Center

**School of Law, 24255 Pacific Coast Highway, Malibu, CA 90263**

	<b>Type of Record</b>	<b>Responsible Officer</b>	<b>Title/Custodian of Records</b>
1.	Student Academic Records	Admissions/Records	Director, Admissions/Records
2.	Admissions	Admissions/Records	Director, Admissions/Records
3.	Alumni	Advancement/Alumni Relations	Director, Advancement/Alumni Relations
4.	Clinical Law	Institute for Dispute Resolution/Clinical Law	Director of Institute for Dispute Resolution/Clinical Law
5.	Financial Assistance	Financial Assistance	Director, Financial Assistance
6.	Honor Proceedings	Associate Dean	Associate Dean, Academic
7.	Career Planning	Career Services	Director of Career Services



**APPENDIX B PEPPERDINE  
UNIVERSITY**

**COST OF RECORDS REPRODUCTION**

Effective the date set forth below, the charge for reproduction of educational records when requested by students shall be \$2.00 for the first page of each separate request, and 10 cents per page for all additional pages. These charges are thought to roughly parallel costs to the University. The University Registrar shall be authorized to collect the usual charges established by his/her office for transcripts.

These charges are subject to change by order of the Provost without prior notice.

**APPENDIX C**

**PEPPERDINE UNIVERSITY**

**FORMS**

1. Request to Inspect and Review Student Records
2. Student Records Release Consent
3. Request to Withhold Release of Directory Information

**REQUEST TO INSPECT AND REVIEW  
STUDENT RECORDS**

I hereby request to inspect and review my student records, which I have not waived my right to see, pursuant to Pepperdine University's Student Records Policy, paragraph (D)(1). I recognize that the University will require University personnel to remain with me during my inspection and review.

The purpose for this inspection and review is as follows:

\_\_\_\_\_.

I would also like to obtain a copy of the following records pursuant to paragraph (D)(4) of the Student Records Policy:

1. \_\_\_\_\_

2. \_\_\_\_\_

3. \_\_\_\_\_

4. \_\_\_\_\_

5. \_\_\_\_\_

Student Identification Number: \_\_\_\_\_

Name (printed): \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

**STUDENT RECORDS RELEASE CONSENT**

I hereby give my consent to the custodian of Records at Pepperdine University to release certain of my student records, as described below, pursuant to the provisions of paragraph (F)(1) of the Student Records Policy.

The purpose of this inspection and review is as follows:

\_\_\_\_\_.

\_\_\_\_\_ has my consent to inspect, review, and/or obtain copies of the following records pursuant to the limitations of paragraphs (F)(4) and (F)(5) of the Student Records Policy:

1. \_\_\_\_\_

2. \_\_\_\_\_

3. \_\_\_\_\_

4. \_\_\_\_\_

5. \_\_\_\_\_

Student Identification Number: \_\_\_\_\_

Name (printed): \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_

STUDENT RECORDS POLICY

**REQUEST TO WITHHOLD RELEASE OF DIRECTORY INFORMATION**

I, \_\_\_\_\_, am aware that the following items are designated as “Directory Information” and may be released for any purpose by the university: (a) student name; (b) address (local, permanent, business, temporary); (c) telephone number; (d) electronic mail address; (e) photograph; (f) major field of study;(g) dates of attendance; (h) classification; (i) enrollment status; (j) participation in officially recognized activities and sports; (k) degrees, honors, and awards received; (l) weight and height of members of athletic teams; and (m) most recent educational agency or institution attended; (n) theses titles/topics.

I understand that under the provisions of the Family Education Rights and Privacy Act (FERPA) of 1974 as amended, I have the right to withhold the disclosure of any or all of the “Directory Information.”

I have considered very carefully the consequences of any decision by me to withhold any category of “Directory Information.” I fully understand that should I decide to inform the institution not to release any or all of this “Directory Information,” any future requests for such information from non-institutional persons or organizations will be refused. Furthermore, that by withholding this “Directory Information”, the school cannot (a) verify my attendance in the institution; (b) include my name in the Dean’s list; and (c) include my name in a graduation program.

I understand that the institution will honor my request to withhold the information indicated but cannot assume responsibility to contact me for subsequent permission to release such information. Regardless of the effect upon me, the institution assumes no liability for honoring my instructions that such information be withheld.

Having understood the above, I would like the release of the following be withheld: (Please check all that apply.)

\_\_\_ All “Directory Information” listed below.

\_\_\_ Each category of “Directory Information” checked below:

\_\_\_ Student’s name

\_\_\_ Student’s Campus Wide ID Number (CWID)

\_\_\_ Address (local, permanent, next of kin, etc.)

\_\_\_ Telephone number

\_\_\_ Electronic mail address

\_\_\_ Photograph

\_\_\_ Classification (Freshman, Sophomore, Junior, Senior, Graduate)

\_\_\_ Major field of study

\_\_\_ Dates of attendance

\_\_\_ Enrollment status (full-time, part-time, undergraduate, graduate)

\_\_\_ Degrees, honors and awards received o Participation in officially recognized activities and sports

\_\_\_ Weight and height of members of athletic teams

STUDENT RECORDS POLICY

\_\_\_\_ Most recent previous public or private school attended by student

\_\_\_\_ Theses titles/topics

I have read and understood the procedure above concerning the release of "Directory Information." I DO NOT WISH TO HAVE INFORMATION NOTED ABOVE RELEASED WITHOUT MY WRITTEN CONSENT. I understand that this request for non-release is valid until I rescind it in writing. (Any such request to rescind must be addressed to the Office of the University Registrar.)

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Student ID Number

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date

STUDENT RECORDS POLICY

Approved this 4th day of January, 2012

By \_\_\_\_\_

Darryl L. Tippens, Ph.D.  
Provost  
Pepperdine University